

October 26, 2022

The Honorable Judge Ronnie Abrams
United States District Court Southern District of New York
40 Foley Square, Room 2203 New York, NY 10007

The Honorable Judge Sarah L. Cave
United States District Court Southern District of New York
500 Pearl St., Courtroom 18A New York, NY 10007-1312

RE : Discovery Status— Meet and Confer with Defendants—Requ
To Honorable Judge Cave and The Honorable Judge Abrams,

Case Schedule 2018 CV 00993

Pro se Plaintiff Trombetta's letter-motion seeking an extension of time to file the joint status letter certifying the completion of fact discovery (the "Letter") (ECF No. 304) is **GRANTED**, and the parties shall file the Letter by **Monday, October 31, 2022**

SO ORDERED 10/28/22


SARAH L. CAVE
United States Magistrate Judge

Pro se Plaintiff writes this letter to inform the Court that I reached out to all attorneys on Wednesday October 26, 2022 to initiate a Meet and Confer regarding fact discovery. Plaintiff's pursuit was in part due to the fact that the Plaintiff's computer malfunctioned on Monday evening as the mousepad froze. Currently my computer is not functioning. On Tuesday, I immediately went in store to service my computer and have another appointment on the 27th. In light of Plaintiff's computer malfunctions, I requested a Meet and Confer to review and discuss the discovery documents and the next steps in litigation. Our proposed Meet and Confer will possibly be Friday October 28, 2022. Plaintiff apologizes to the Court for this unforeseen inconvenience. The extent of litigation in conjunction with my standard computer may be taxing it's system. In short, I am asking that the joint Letter to the Court for fact discovery be postponed to Monday morning, due to my current computer issue, the delay this has inflicted and the anticipated meeting with the Defendants' attorneys on Friday.

Plaintiff has been keeping abreast of the Court's correspondence and direction. Upon reading Doc. 302, Plaintiff did contact the New York Legal Assistance Group last week, however NYLAG is not always available upon request. It is a reliable service, yet it is working with many other Pro Se litigants. Also, prior to writing my October 19, 2022 letter (Doc. 301), Plaintiff did read on October 9, 2022 in Doc. 291, Judge Caves' Order which stated "*The parties shall adhere to the individual practices of the Honorable Ronnie Abrams concerning the filing and contents of any motion(s) for summary judgment or pretrial filings, including a proposed joint pretrial order.*" As per instructed, I went to Judge Abrams's Individual Rules and Practices in Civil Cases. Judge Abrams wrote "Except in Pro Se Cases" in two items under her Motion for Summary Judgment directions

D. Motions for Summary Judgment :

i. Except in pro se cases, the moving party shall provide all other parties with an electronic copy, in Word format, of the moving party's Statement of Material Facts Pursuant to Local Civil Rule 56.1. The opposing party must reproduce each entry in the moving party's Rule 56.1 Statement, and set out its response directly beneath it. If the opposing party wishes to file its own, additional statements of material fact, it shall begin numbering each entry where the moving party left off.

ii. Except in pro se cases, the parties shall provide the Court with an electronic, text- searchable courtesy copy of any hearing or deposition transcription which the parties rely, if such a copy is available, unless doing so would be unduly burdensome. Parties should provide these materials on a CD only, not on a DVD or memory stick and not by email.

As per advised by the New York Legal Assistance Group attorney, the details of summary judgement are not ripe at this time and suggested I focus on the current issues which is the end of fact discovery and the submission of my proposed amended complaint.

I kindly ask the Court to keep in mind that the Plaintiff, during the month of September, had to respond to a summons and complaint filed in the state of Georgia by Will and Shari Seippel and WorthPoint Corporation, the Defendant in this litigation. With these unforeseen and unanticipated demands that required my immediate attention, Plaintiff, just like my computer, has been overtaxed by the constant

demands by the Defendants and their attorneys pertaining to this litigation. WorthPoint has three attorneys working on this case and another attorney with the case in Georgia. I am only one Pro se litigant who is concurrently responding to the demands of four attorneys.

Plaintiff, as a Pro Se litigant and in light of my computer problem, is requesting that the joint letter to the Court be extended from Friday October 28th to Monday October 31, 2022. Secondly, it might be wise at this time, in lieu of the status of my computer, to ask the Court to extend the date of submission of my proposed amended complaint from Friday November 4th to Monday November 7, 2022. The slight delay is in tandem with the unanticipated computer issue and status. Once again, I extend my apologies to the Court for this inconvenience.

October 26, 2022

Annamarie Trombetta
175 East 96th Street (12 R)
New York, New York 10128

Respectfully Submitted,

——— Electronic Signature ———

/s/ Annamarie Trombetta October 26, 2022

Annamarie Trombetta